

Judge:
Chapter:

Christopher M. Alston
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UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON

In re:

STANLEY J. CAREY and
MARY K. CAREY,

Debtors.

Case No. 22-11595-CMA

EX PARTE APPLICATION FOR 2004
ORDER AUTHORIZING CHAPTER 7
TRUSTEE JEFFREY I. GOLDEN TO
COMPEL PRODUCTION OF
DOCUMENTS AND DECLARATION IN
SUPPORT THEREOF

Jeffrey I. Golden, Chapter 7 Trustee, moves this court for an *ex parte* order compelling production of documents by Nancy Chesnutt ("Chesnutt"), specifically records related to the alleged landlord-tenant relationship between debtors Stanley J. Carey and Mary K. Carey and Chesnutt.

Date: November 13, 2023

RAMSAUR LAW OFFICE

/s/ Brett H. Ramsaur

Brett H. Ramsaur, WSBA #41980
Special Litigation Counsel for
Chapter 7 Trustee, Jeffrey I. Golden

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1. I am the Special Litigation Counsel for Chapter 7 Trustee, Jeffrey I. Golden (the “Trustee”) in this case. I make this declaration from my personal knowledge, and I am competent to testify.
2. The Trustee is investigating the financial transactions, assets and liabilities of debtors Stanley J. Carey and Mary K. Carey (“Debtors”). I am seeking documentation of any lease agreement(s) and other financial transactions between Debtors and Nancy Chesnutt, along with payment devices evidencing the same. The Trustee is seeking a 2004 order which authorizes the Trustee to compel the production of those records by the date set forth in a subpoena to be issued by me.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge. Signed and dated this 13th day of November, 2023 at Tacoma, Washington.

/s/ Brett H. Ramsaur
Brett H. Ramsaur, WSBA #41980